

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

**24 MAG 2275**

UNITED STATES OF AMERICA

v.

ALBERTO ROMAN,

Defendant.

**SEALED COMPLAINT**

Violations of 18 U.S.C. § 1951

COUNTY OF OFFENSE:  
BRONX

SOUTHERN DISTRICT OF NEW YORK, ss.:

STEVEN M. SAINT HILAIRE, being duly sworn, deposes and says that he is a Detective with the New York City Police Department (“NYPD”) and Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”) Joint Robbery Task Force, and charges as follows:

**COUNT ONE**  
**(Hobbs Act Robbery)**

1. On or about February 8, 2024, in the Southern District of New York and elsewhere, ALBERTO ROMAN, the defendant, knowingly committed robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and thereby obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, ROMAN robbed a pharmacy in the Bronx, New York.

(Title 18, United States Code, Section 1951.)

2. I am a detective with the NYPD and am assigned to the ATF/NYPD Joint Robbery Task Force. I have been personally involved in the investigation of this matter. This affidavit is based upon my conversations with other law enforcement officers, my examination of witness statements, and my examination of surveillance video footage, photographs, and other law enforcement records. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts that I have learned during my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

3. Based on my participation in this investigation; my conversations with other law enforcement officers; my examination of witness statements; and my review of law enforcement reports, surveillance video footage, and photographs, I have learned the following, in substance and in part:

The February 8, 2024 Robbery

a. On or about February 8, 2024, at approximately 9:33 a.m., an individual (the “Robber”), entered a pharmacy located on East 161<sup>st</sup> Street in the Bronx, New York (the “Pharmacy”). The Robber was wearing a black coat, a black baseball hat with stickers, black sneakers with three white stripes on each side, a black backpack, and a black mask.



*Still images of the Robber taken from the Pharmacy's video surveillance<sup>1</sup>*

b. After entering the Pharmacy, the Robber brandished what appeared to be a firearm at an employee of the Pharmacy (“Victim-1”); demanded that Victim-1 give him narcotics; and hit Victim-1 in the back with the firearm. The Robber then went behind the counter of the Pharmacy and stole approximately \$5,000 worth of narcotics and cash (the “Robbery”).



*Still images of the Robber taken from the Pharmacy's video surveillance*

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<sup>1</sup> The light or angle of this video camera in the Pharmacy gives the Robber's clothing a grey tint, but the other video cameras in the Pharmacy and vicinity of the Pharmacy depict the Robber's clothing as black.

Identification of ALBERTO ROMAN

4. Based on my personal involvement in the investigation of this matter, my review of reports and records, and my discussions with other law enforcement personnel, I have learned the following about the identity of the Robber, among other things:

c. On or about February 9, 2024, after the Robbery, an NYPD officer (“Officer-1”) interviewed the owner of the Pharmacy (“Victim-2”), who had been present at the Pharmacy during the Robbery. Victim-2 stated, in substance and in part, that the Pharmacy had been robbed in 2020 and that he was “very sure” that the Robber was the same individual who had committed the robbery in 2020, because he had the same voice and build and committed the Robbery in the same manner as the individual who had committed the 2020 robbery. Based on my review of reports and records from the NYPD and ATF, I know that the NYPD investigated a robbery of the Pharmacy that occurred on or about December 14, 2020.

d. Based on my review of NYPD reports and records and my discussions with other law enforcement officers, I know that on or about February 17, 2024, an individual later identified as ROMAN, entered a pharmacy located on Lenox Avenue in New York, New York. ROMAN brandished a firearm, a 9mm Luger caliber Smith & Wesson semi-automatic pistol, and removed approximately \$40,000 worth of narcotics and an unknown amount of cash. When ROMAN attempted to flee, a bystander grabbed ROMAN, who was then placed under arrest by NYPD officers. ROMAN was wearing the black jacket and black shoes with three white stripes on each side that the Robber appeared to be wearing during the Robbery of the Pharmacy on February 8, 2024.



*Still image of Robber in the vicinity of the Pharmacy at approximately 8:58 a.m. on February 8, 2024*



*Still image of ROMAN on February 17, 2024 in the vicinity of the Lenox Avenue pharmacy*

e. Based on my review of records obtained from EcoATM,<sup>2</sup> on or about January 27, 2024, ALBERTO ROMAN, the defendant, used an EcoATM located in the vicinity

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<sup>2</sup> An EcoATM is an automated recycling kiosk that provides cash in exchange for selling or recycling cellphones.

of 416 East 149<sup>th</sup> Street in the Bronx, New York, to sell his cellphone in exchange for cash. The EcoATM took pictures of ROMAN while he was using it. The EcoATM also required that ROMAN provide an identification card. The pictures taken by the EcoATM show that ROMAN was wearing the same black hat with stickers that the Robber wore during the Robbery. The identification card that ROMAN provided to EcoATM identified him as “Alberto Roman.”



*Close-up image of Robber's hat taken from video surveillance on February 8, 2024 in the vicinity of the Robbery*



*Still image of ROMAN taken from EcoATM*

f. Surveillance video on or about January 27, 2024, taken from the location of the EcoATM, shows that when ROMAN was using the EcoATM, he was also wearing a black jacket and black backpack that appear to be the same black jacket and black backpack that Robber-1 wore during the Robbery.



*Still image of Robber from surveillance video of Robbery*



*Still image of ROMAN from surveillance video of EcoATM location*

g. On or about April 30, 2024, ROMAN was advised of his *Miranda* rights, verbally waived those rights, and stated, in substance and in part, in my presence, that he had committed the Robbery. In particular, ROMAN stated, in substance and in part, the following:

- i. ROMAN committed the Robbery by himself.
- ii. ROMAN designed the baseball hat that he wore during the Robbery.
- iii. ROMAN had robbed the Pharmacy before.<sup>3</sup>
- iv. ROMAN used a BB gun to rob the Pharmacy.
- v. ROMAN took a “bagful” of narcotics from the Pharmacy.
- vi. ROMAN believed he recalled one of the employees of the Pharmacy from when he previously robbed the Pharmacy.
- vii. ROMAN committed the Robbery because he has a problem and cannot stop committing crimes.

**INTERSTATE COMMERCE**


5. Based on my conversation with an employee of the Pharmacy, I have confirmed that the Pharmacy sells items that have been manufactured outside of New York State and sells items in interstate commerce.

WHEREFORE, I respectfully request that a warrant be issued for the arrest of ALBERTO ROMAN, the defendant, and that he be arrested, and imprisoned or bailed, as the case may be.

/s Steven M. Saint Hilaire (By Court with Authorization)

STEVEN M. SAINT HILAIRE  
DETECTIVE  
NEW YORK CITY POLICE DEPARTMENT

Sworn to me through the transmission of this  
Affidavit by reliable electronic means, pursuant to  
Federal Rules of Criminal Procedure 41(d)(3) and 4.1,  
this 14th day of June 2024.

  
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THE HONORABLE SARAH L. CAVE  
United States Magistrate Judge  
Southern District of New York

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<sup>3</sup> ROMAN stated that he had robbed the Pharmacy in 2018.